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10 Attorneys for Defendants
 11 DeVRY EDUCATION GROUP INC.,
 12 DeVRY UNIVERSITY, INC. and
 DeVRY/NEW YORK INC.

13
 14 **UNITED STATES DISTRICT COURT**

15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

16 FEDERAL TRADE COMMISSION,

Case No. 16-CV-579-MWF-SS

17 Plaintiff,

18 v.

19 DeVRY EDUCATION GROUP
 INC., formerly known as DeVry
 20 Inc., a corporation;

21 DeVRY UNIVERSITY, INC., a
 California corporation; and

22 DeVRY/NEW YORK INC., a
 23 corporation;

24 Defendants.

**INTERIM STIPULATION
 REGARDING CONFIDENTIAL
 DOCUMENTS AND INFORMATION**

1 Plaintiff Federal Trade Commission ("FTC") and Defendants DeVry
2 Education Group Inc., DeVry University, Inc., and DeVry/New York Inc. enter into
3 this Interim Stipulation governing the handling of confidential information produced
4 by the FTC to Defendants until such time as a Protective Order is entered by the
5 Court. This Stipulation is necessary because the FTC's response to Defendants' First
6 Set of Document Requests is due on August 24, 2016. The Parties are currently in
7 the process of negotiating a Protective Order in this matter, which will be submitted
8 to the Court for its approval and which will protect, among other things, confidential
9 information contained in documents produced by the FTC, but such Protective Order
10 will not be finalized and entered by the Court before the FTC's production is due.
11 Therefore, the Parties enter into this Stipulation in order to protect the confidentiality
12 of documents and information that will be produced by the FTC in response to
13 Defendants' First Set of Document Request until such Protective Order has been
14 agreed upon and entered by the Court.

15 Pursuant to this Stipulation, Defendants agree not to publically file or
16 otherwise publicly disclose any document or information produced by the FTC to
17 Defendants that the FTC designates confidential. Nothing herein shall bar review of
18 such confidential document or information by Defendants' employees, Defendants'
19 outside counsel or retained experts, or those working under such counsel's or
20 expert's supervision who agree not to disclose such confidential document or
21 information to anyone not permitted by this Stipulation to review such confidential
22 document or information.

23 This Stipulation will be superseded by the aforementioned Protective Order,
24 once it is issued by the Court, at which time this Stipulation will cease to have any
25 further force or effect.
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1 Dated: August 24, 2016

KAYE SCHOLER LLP

2
3 By /s/ Bryan Westhoff

4 Bryan Westhoff

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